



MATTHEW L. SCHWARTZ
Tel.: (212) 303-3646
E-mail: mlschwartz@bsfllp.com

February 7, 2020

BY ECF

Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Suite 1950
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,
Case No. 19 Civ. 2645 [rel. 15 Civ. 5345] (AJN) (KHP)**

Dear Judge Parker:

We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”) and write on behalf of all parties pursuant to the Court’s January 10, 2020 Order to provide an update on the status of discovery and whether the parties wish to schedule a settlement conference. [See ECF No. 154.]

In January 2020, the Kazakh Entities issued seven subpoenas seeking documents and testimony from four additional third-party witnesses. We are working with those third parties and opposing counsel to find suitable deposition dates and to secure responsive document productions, but at present, we have no disputes to raise with the Court. It is possible, however, that the Kazakh Entities will need to file one or motions to compel in the appropriate courts of compliance. As to party discovery, the Kazakh Entities noticed the deposition of defendant Ferrari Holdings and are discussing a suitable date with defendants. The Kazakh Entities also finished their rolling productions of documents covered by the stipulation in the related action allowing for production of that discovery in this case. We anticipate in February issuing additional third-party subpoenas and coordinating dates with the Sater and Ridloff defendants for their depositions.

At the present time, the parties are not seeking to schedule a settlement conference with the Court.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz

cc: All Counsel of Record
(By ECF)